EPA comments on RR Deliverables for Wallace Yard and Spur Lines August 25, 2009 compared to Oct 7, 2009

RADs for Wallace Yard and Hercules Mill

- ✓ Flow drainage patterns and surface water structures and elevations thereof (notably some of these features are included). It is not apparent from the drawings where surface water is currently conveyed or how it will be incorporated into the design.
    - Partially addressed, there is still a reliance on things to be addressed in a SWPPP. The SWPPP will be added as a deliverable under the SOW for need to be displayed on the schedule so that EPA/IDEQ review and approval.

- ✓ Design details such as cross sections of ditches, rock armoring at outfalls, rock armoring at intake structures, top of bank/barrier details are not displayed.
    - Improved, but now must be refined. Still missing key parameters such as key in depth in drawings. Include within detailed SWPPP.

- ✓ Comprehensive site water management is not portrayed and is not described.
    - Still lacking. Resolve through revised RADs or detailed SWPPP.

- ✓ Over-reliance on the SWPPP (Note 2 on G2) to solve all things related to surface water is not appropriate. The SWPPP is intended to address stormwater issues during construction. However, the SWPPP is not intended to incorporate the long-term site water management issues, but rather how you are going to manage stormwater, and prevent erosion during construction. Please incorporate the site water features as noted above and in our previous conversations on this topic.
    - Generally, this comment is still true, although improvements have been made. Example of inappropriate over-reliance: the decon station details have been deferred to the SWPPP. Insert details into RADs.

- ✓ Note 5 on G2 is partially responsive to the government's request to protect existing veg, but there should be callouts noting heavier vegetation such as east of the HM foundations, as we commented on previously.
    - Insert note on RADs to provide for pre-construction staking with review and approval by EPA

- ✓ Fence needs to completely encircle the foundations at HM to be functional - modify drawing C5 and others where applicable.
    - Barbed wire fence will not adequately prevent access to the foundations. Revise RADs to reflect consistent fencing around entire foundations.

- ✓ Detail 4 on C11 fails to account for existing riprap on Streambank and how the bank integrity will be preserved or replaced and how drainage will be conveyed...
    - Detail has been added. However, there is still concern about how flows will be conveyed and examples of lacking details on C-8/C-9 area N. of Old Yellowstone Highway - no drainage patterns. Add detail to RADs.

- ✓ Detail on C13 is incorrect. Fence line is at edge of clean barrier, verify your dimensions, location and width of barrier, as well – revise drawings to correct.
    - RADs show dimension for this corridor is 26 feet. Insert note to RADs that typical width is 26' but that actual dimensions may vary.

- ✓ Display access points and decon station locations and details in drawings.
  - Partially addressed but incomplete. Insert detail into RADs.

- ✓ C4 detail C 'Typical Detail for Placement of 12 in Aggregate Suitable for Road Use'. Is this the same material called 'Coarse Aggregate Base' in 1B1. If so, is it suitable for road use and will it withstand intended use? Please provide adequate testing and requirements to display that it will or change spec and then display such suitability.
  - Still a nomenclature inconsistency.

- ✓ C11, cross section 2, provide design data, calcs, or modeling to show that grain size is adequate to withstand anticipated runoff velocities. Also applies to all existing drainage channels.
  - Not addressed. Typically such backup information is provided in design basis reports or other such work documents, which are not defined as deliverables in this case. As such, provide information in appendix to PMPS.
- ✓
- ✓ C4, C5, C7, C9 and others: at a minimum display erosion control barriers such as straw wattles, erosion control fabric, fences, bles, mulching between work areas and surface water. These materials are best addressed in a TESC to be included as part of this deliverable.
  - Not addressed. Include Temporary Erosion and Sediment Controls (TESC) plan as appendix to SWPPP.

NEW COMMENTS:

- ✓ G2: add a symbol for Monitoring Wells

- ✓ It's still not clear that note 4 on G2 will protect existing monitoring wells. Add note to RADs that work conducted near monitoring wells will be executed in such a manner so as not to disturb wells or the protective structures.

- ✓ G2 Note 8 seems to conflict with note 5. We want to maximize the vegetation preserved in this action.

- ✓ Sheet C12, it is helpful to label riprap size consistent with PMPS.

- ✓ Sheet C4 unpaved parking is going to primarily drain to the entrance. That's not a good plan. Please revise sheet C4.

- ✓ C5, C6, C7 are all the dense tree areas going to have the large trees protected? Same question for along the trail.

- ✓ C8, C9 barrier should be vegetated for area N. of Old Yellowstone Hwy and sloped to roadside ditch if it exists. Protect trees and shrubs next to river maximum extent.

- ✓ C16, detail 15. What is it that you are going to require of your contractor? This detail does not display any requirements. May want to label the well enclosure "typical".

RADs for Spur Lines

New General Comment 3: PE's name is still shown on drawings. Person has changed employment role is uncertain. Who is the Idaho P.E. that is going to stamp the final RAD drawings on this project?

Still unanswered.

New General Comment 4: the barrier type on the RADS calls for gravel only. The EE/CA called for gravel or vegetated. Match RADs to EE/CA.

Not addressed.

Other specific examples of issues that must be fixed:

- ✓ Note 4 on C2
  - Delete note 4 as redundant with note on drawing.
- ✓ Add note to all drawings to preserve and protect all existing infrastructure, drainage ways, wells, culverts, intakes, etc.
  - Add 'preserve' to this statement on all sheets.
- ✓ ROW overlaps road and residences. Drawings should display that road shoulder and residential RUAs will be remediated. (e.g., NPRY mm 0.4 to < 1.25, 0.0 - 0.25, both NMC, etc).
  - This segment assumes that since BPRP is administered, road shoulders won't have to be remediated by the RRs. That is inaccurate and must be corrected on drawings. Road shoulders are implemented as part of the BPRP program, whenever possible, but these drawings cannot preclude their being done by the RRs. Sampling has been conducted and determines need.
- ✓ Note 2 calls for spreading contaminated soils - this is not in conformance with CD/SOW.
  - This may be workable but must be coordinated with EPA. Insert note on RADs and in PMPS that any such instances will be site-specific and proceed only with EPA approval.
- ✓ Delete Note 4 sheet C3
  - Same as Note 4 on C2
- ✓ NPY mm >5.0 should note that high contaminant levels documentation has been presented and provided by Gov't. Also include note that the RR will perform additional sampling and removal or capping based on such sampling and subject to review and approval of EPA.
  - O.k., but drawings suggest there is no access to this location. There is in fact access from beyond 5.3. Please revise. There is also language in RAWP that describes debris as not being necessary to dispose. It would not be appropriate to discard or leave that material there.
- ✓ MM 4.7 in CC to 4.9 runs thru a residential area and will require road shoulder capping. This is not included in these drawings.
  - O.k. if confirmed no residences.
- ✓ Display access points and decon station locations and details.
  - Not addressed. Should be.

NEW COMMENTS

- ✓ Detail B on C21 show max width for road shoulder = 2.5 feet. Dimension is determined by ROW width. If the ROW only overlapped 1 foot with the road shoulder, we would only ask to remediate 1 foot.
- ✓ A Field survey by an Idaho PLS would clear up many questions as to where/when/quantity. It would be an acceptable approach to EPA if that is agreeable to the RRs.
- ✓ Why the gap in RA at mm 2.25 to 2.60 sheet C4/C5?
- ✓ Segment MM 3.25 – 3.5 WIRR (C14) We need to verify this segment is complete.
- ✓ Sheet C21, detail B: change width to varies, it would be appropriate to state that 2.5' is typical, but not a maximum.
- ✓ Include culvert aprons detail and work from WY to Spur Lines.
- ✓ Shoshone County is planning road construction on Nine Mile Road. Please insert note that coordination will be performed to avoid impacts.
- ✓ General note: there are many segments where dense vegetation is not shown but should be displayed. Please reflect additional detail on drawings or insert note on RADs that agreement with EPA/DEQ will be reached in the field as to the lateral extent of the action..
- ✓ C2, note 2 reference RAWP section on consolidation.
- ✓ C2, note 5 copy to all drawings
- ✓ C2 and all elsewhere, revise BPRP callouts and notes to read "BPRP remediation will be implemented at properties along this sement MM XX to XX based on sampling and analysis."
- ✓ G2, note 7 add in coordination and agreement by EPA. Also add to WY Drawings.
- ✓ G2, note 8 add and conform with PMPS as determined in accordance with the QA/QC Plan. Also add to WY Drawings.
- ✓ C9, change barrier to vegetated between ~ MM 0.7 and 0.85
- ✓ C3 & 4, there are labels identifying steep slopes but the symbols are not employed. If the portrayal on the drawings is correct, the narrowing of the

FROWW makes sense. In field determines will be necessary to be sure that EPA is in agreement.

- ✓ C7 notes 4 and 5: it's important that these 2 notes do not conflict or prevent the implementation of a response at the hot spot.

- ✓ C15, road shoulder will not intercept gravel road which will abut road – detail?

- ✓ C18 BLM raises issue of eroding embankment needing protection. Reviewed during field trip and believed that there was general consensus.

PMPS

- o Insert a sub-section in section B to ensure that the parking lot is graded to drain and will not result in ponding of surface water on the lot.
  - Not Addressed. Should be.